

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

LIGHT OF THE WORLD GOSPEL)	Case No. 8:18-cv-312
MINISTRIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	JOINT MOTION TO CONTINUE
)	STAY OF PROCEEDINGS
VILLAGE OF WALTHILL, NEBRASKA,)	
)	
Defendant.)	

COME NOW the parties, Plaintiff Light of the World Gospel Ministries, Inc. (“LOTW”) and Defendant Village of Walthill, Nebraska (“Walthill” or the “Village”), and hereby jointly request a continuance of the stay of progression deadlines and proceedings entered by the Court.

In support of this motion, the parties jointly show the Court:

1. This Court previously granted a joint motion to extend stay on June 2, 2021. (Text Order, Filing No. 161.)
2. The parties participated in private mediation with Michael G. Mullin on February 27, 2021 and March 3, 2021. The parties have exchanged several drafts of papers designed to resolve this case and believe they are close to reaching an agreement and will continue settlement negotiations in hopes of reaching a final agreement.
3. In addition, the Board of Trustees of the Village must formally approve any resolution before it can be finalized and submitted to the Court for approval. The Village has a board meeting scheduled for September 1, 2021, during which the Board will consider approval of the settlement, should the parties reach agreement.
4. The parties desire to stay all discovery, motion, and other deadlines in the case until settlement negotiations are complete.

5. In the event the parties are unable to resolve the case through settlement, they seek to stay entry of a progression order regarding discovery, motions, and other deadlines in the case for an additional month, up to and including October 13, 2021.

WHEREFORE, the parties jointly request that this Court continue the stay of all discovery, motion, and other deadlines in this matter until October 13, 2021, for the reasons set forth above.

DATED this 5th day of August, 2021.

Respectfully submitted,

VILLAGE OF WALTHILL, NEBRASKA,
Defendant,

By:

s/ Jason W. Grams

Jason W. Grams, #24596
LAMSON, DUGAN & MURRAY, LLP
10306 Regency Parkway Drive
Omaha, NE 68114
Tele: (402) 397-7300 | Fax: (402) 397-7824
jgrams@ldmlaw.com

and

Jerry L. Pigsley, #16639
WOODS & AITKEN LLP
301 South 13th Street, Suite 500
Lincoln, NE 68508-2578
Telephone: (402) 437-8500
Fax: (402) 437-8558
jpigsley@woodsaitken.com
ATTORNEYS FOR DEFENDANT

LIGHT OF THE WORLD GOSPEL
MINISTRIES, INC, Plaintiff,

s/ Roger Byron

Roger Byron, Tex#24062643
FIRST LIBERTY INSTITUTE
2001 W. Plano Parkway, Suite 1600
Plano, TX 75075
Tele: (972) 941-4444 | Fax: (972) 941-4457
rbyron@firstliberty.org

and

Jefferson Downing
KEATING, O'GARA, NEDVED
& PETER, P.C., L.L.O.
530 South 13th Street, Suite 100
Lincoln, NE 68508-2795
jd@keatinglaw.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing joint motion to stay pending mediation has been filed in the Court's CM/ECF system which will effect service upon all counsel of record on this 5th day of August, 2021. The following individuals will be served with this document via regular US Mail, postage prepaid:

Bradley Irwin
615 6th Avenue
South Sioux City, NE 68776

s/ Jason W. Grams

733120.2